

## UNITED STATES DISTRICT COURT

for the  
Northern District of New YorkIn the Matter of the Search of  
(Briefly describe the property to be searched or identify the person by  
name and address)

Case No.

5:23-mj-409(TWD)

UNITED STATES POSTAL SERVICE PRIORITY  
MAIL EXPRESS PARCEL  
BEARING TRACKING NUMBER  
EI 688-956-625 US CURRENTLY LOCATED AT  
THE U.S. POST OFFICE AT 5640 EAST TAFT  
ROAD, SYRACUSE, NEW YORK 13220

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Northern District of New York, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

## Code Section

21 U.S.C. § 841(a)(1)  
 21 U.S.C. § 846  
 18 U.S.C. § 1956

## Offense Description

Distribution or Possession with Intent to Distribute a Controlled Substance  
 Conspiracy to Distribute a Controlled Substance  
 Money laundering

The application is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

☐ Delayed notice of \_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Irving Reynolds

Applicant's signature

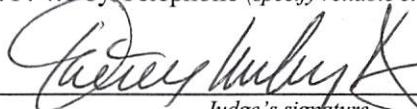
Irving Reynolds, Task Force Officer for USPIIS

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by Telephone (specify reliable electronic means).

Date:

July 21, 2023

  
 Judge's signature

City and state: Syracuse, NY

Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

**IN THE MATTER OF THE SEARCH OF  
UNITED STATES POSTAL SERVICE  
PRIORITY MAIL EXPRESS PARCEL  
BEARING TRACKING NUMBER  
EI-688-956-625 US CURRENTLY  
LOCATED AT THE U.S. POST OFFICE  
AT 5640 EAST TAFT ROAD,  
SYRACUSE, NEW YORK 13220**

Case No.

**Filed Under Seal**

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Irving E. Reynolds, being duly sworn, depose and say as follows:

**INTRODUCTION**

1. I am a Task Force Officer (“TFO”) with the United States Postal Inspection Service (“USPIS”) currently assigned to the Contraband Interdiction and Investigation (“CI2”) Team in Syracuse, New York. Thus, I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 3061. I have been a Police Officer with the City of Syracuse Police Department for over four years, with over two years of that time serving as a Detective in the Special Investigations Division (“SID”). SID focuses primarily on investigating narcotic-related offenses. Prior to working for the City of Syracuse, I was a Police Officer in New York State for approximately ten years. I have received training in criminal investigations, procedures, and criminal law, and I have acted as the lead investigator and have also assisted other law enforcement agents in numerous criminal investigations and in the execution of search warrants. I have received training from the USPIS in the investigation of controlled substances and proceeds/payments for controlled substances being transported through the United States Mail. I have also received asset forfeiture

training and have consulted with senior Postal Inspectors. Further, I have been the affiant on multiple previous federal search warrants which have resulted in the seizure of controlled substances.

2. This affidavit supports an application to search United States Postal Service (“USPS”) Priority Mail Express (PME) parcel EI-688-956-625 US, which is more thoroughly described in Attachment A (hereinafter referred to as “the Subject Parcel”), for evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Section 841(a)(1) and (846) and 18 U.S.C. § 1956. The Subject Parcel is currently in the custody of USPIS, located at 5640 East Taft Road, Syracuse, NY 13220 (“Syracuse Office”).

3. The information contained in this affidavit is based on my knowledge, my observations during this investigation, information conveyed to me by other law enforcement officers, and on my examination and review of physical evidence obtained during the investigation.

4. This affidavit contains only that information necessary to establish probable cause in support of an application for a search warrant authorizing search of the Subject Parcel. This affidavit is not intended to include every fact and matter observed by or made known to agents of the government.

#### **PROBABLE CAUSE**

5. On Thursday, July 20, 2023, I was conducting a review of outbound USPS PME parcels at the Syracuse, New York, USPS Processing and Distribution Center (P&DC) located at 5640 East Taft Road, Syracuse, New York. During that time, I observed the Subject Parcel, which was addressed to “The Claro Consulting, 3234 E. Yosemite, Ontario, CA 91762”. The Subject Parcel was mailed in a USPS PME mailing box, white with blue and red trim, and bore the return address of “Joe Allwood 404 Auburn Heights, Auburn, New York 13021.” I conducted additional

review of the Subject Parcel because it was mailed to Ontario, California, an area in Southern California, east of Los Angeles, known to be a drug source location for a variety of illegal drugs including marijuana and cocaine. In addition, the mailer selected Priority Mail Express service and paid \$83.55 in cash for the service. Priority Mail Express is the USPS's most expedited service, indicating the importance of the contents. It is also noteworthy that the sender did not request that a signature be required from the recipient at the time of delivery. Through my training and experience, I know that those shipping illegal goods, such as narcotics or currency which is payment for narcotics, frequently decline the signature service because it requires the recipient to take personal possession of the package in the presence of a USPS employee.

6. Postal Inspection Service personnel conducted a CLEAR<sup>1</sup> query for the address of 3234 E. Yosemite, Ontario, CA 91762 which showed no association of the name "In The Claro Consulting," or any business with a similar name variation. A second CLEAR query was conducted for the return address of 404 Auburn Heights, Auburn, New York 13021, and no one with the name "Joe Allwood" could be associated to the address. I am aware it is common for mailers of illegal drugs, and proceeds of illegal drug activity, to use fictitious names, names other than their own, or fictitious business names to avoid detection by law enforcement. I believe in this instance, the return addressee name of "Joe Allwood" is an attempt to avoid placing the mailer's true name and identity on the Subject Parcel in case it is intercepted by law enforcement. Additionally, I believe that the delivery name of "The Claro Consulting" is an attempt to avoid placing the recipient's true name and identity on the Subject Parcel for the same reason stated above.

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<sup>1</sup> CLEAR is a fee-based database of information commonly used by law enforcement to confirm names, addresses, telephone numbers, and other personal identifiers.

7. Further, I reviewed USPS business records regarding 3234 E. Yosemite Dr., Ontario, California 91762 for the last year to date. I observed twenty-nine previous USPS Priority Mail Express parcels originating in Auburn and Union Springs, New York that were sent to 3234 E. Yosemite Dr., Ontario, California 91762. Additionally, USPS records indicate that US Postal Inspector Matthew Puro seized a similar package originating from Union Springs, New York 13160, with a return sender name of “Jake Allwood” on December 17, 2018. This package was being sent to “Mario Z, 1010 Willshire Blvd # 304, Los Angeles, California 90017.” The same surname “Allwood” is present on both packages and appears to have the same handwriting for both package labels. This Priority Mail Express parcel weighed approximately 6 lbs. 5.00 oz. and was found to contain \$50,000.00 cash.

8. On July 21, 2022, at approximately 9:34 a.m., the Subject Parcel was subjected to non-intrusive canine exam by United States Border Patrol Agent/Homeland Security Investigations (HSI) Task Force Officer (TFO) Javier Lorenzo and his canine partner “Ekym.” At 9:35 a.m., TFO Lorenzo informed me that “Ekym” alerted to the Subject Parcel. I was present for the canine exam and observed “Ekym” alert to the Subject Parcel. TFO Lorenzo provided a detailed affidavit on the canine exam and the canine’s training and certification. A copy of the affidavit for the canine examination is attached as **Exhibit #1**.

9. I am aware, through experience and conversations with canine handlers, that people who regularly handle controlled substances often leave the scent of controlled substances on the box, packaging materials, and other package contents they handle, including cash. Packaging materials also are often stored near the controlled substances, transferring the odor of the controlled substance to the packaging materials, contents, and parcel. Narcotics detection canines receive training to alert on these scents.

10. Based on my training and experience, I believe the Subject Parcel may contain proceeds of illegal drug activity in the form of U.S. Currency and am aware that it is common for mailers of proceeds of illegal drug activities, including U.S. currency, to utilize the USPS to transport the proceeds to avoid body-carrying the U.S. currency onboard a commercial aircraft. Drug traffickers are aware that TSA screening prior to boarding a commercial aircraft is likely to identify the U.S. currency, drawing unwanted attention to the persons carrying the U.S. currency, often resulting in forfeiture of the funds. Drug traffickers also are aware that driving the U.S. currency across the United States is risky due to the possible detection by law enforcement, or worse, subject to robbery by people known or unknown seeking the money for themselves.

11. Drug traffickers are aware that reporting any robbery of proceeds of illegal drug activity to local law enforcement will also draw unwanted attention and identification; therefore, utilizing the U.S. Mails to transport U.S. currency gained in illegal drug activity is convenient, and the ability to list names and addresses other than the drug trafficker's true name and address affords the ability to avoid detection by law enforcement.

12. I am aware, through my training and experience, that it is common for those mailing illegal drugs to use Priority Mail Express. This is true for many reasons, including because:

- a. Items sent via Priority Mail Express is considered First Class Mail and cannot be examined without a federal search warrant;
- b. Priority Mail Express is generally expected to be delivered in 1-2 business days. This ensures the drug trafficker of expedited delivery;
- c. Various dispatch times (times which a mailed item is transported to the next destination) are available to customers, upon request, and this gives the mailer the opportunity to have some control over the arrival of the mailed item;

- d. Individuals desiring to either send or receive controlled substances and payments for these substances through the U.S. Mail can do so without having to provide identification, thereby reducing the possibility of revealing their identity; and
- e. Priority Mail Express parcels include individual parcel tracking numbers, which allow the sender, and/or intended recipient, to track the travel of the parcel after it is posted by telephone or internet.

### CONCLUSION

13. The above facts establish probable cause to believe that the Subject Parcel contains evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846, and Title 18, United States Code, Section 1956.

ATTESTED TO BY THE APPLICANT BY TELEPHONE IN ACCORDANCE WITH THE REQUIREMENTS OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE.

*Irving Reynolds*

Irving E. Reynolds  
Task Force Officer for U.S. Postal  
Inspection Service

I, the Honorable Thérèse Wiley Dancks, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on July 21, 2023, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

*Thérèse Wiley Dancks*  
Thérèse Wiley Dancks  
United States Magistrate Judge



# **Exhibit #1**



## **AFFIDAVIT**

I, Javier Lorenzo, being duly sworn, depose and state:

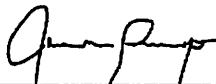
I am a United States Border Patrol Agent assigned to the Buffalo Sector Border Patrol, which is part of the Bureau of Customs and Border Protection. My current duty station is the Oswego Border Patrol Station. Currently, I am detailed as a Task Force Officer assigned to Homeland Security Investigations in Syracuse, NY. Additionally, I, along with my K-9 partner Ekym (220003) have been a successful K-9 team since December 15th of 2021. I have been a K-9 Handler since March 17th of 2007. I, along with my K-9 partners' have detected numerous amounts of concealed narcotics during our careers'. K-9 Ekym is trained in detecting the presence of odors of marijuana, cocaine, heroin, methamphetamines, ecstasy, and their precursors. I, along with K-9 Ekym maintain a yearly certification and train a minimum of 16 hours a month. This certification is maintained by the United States Border Patrol National Canine Facility located in El Paso, Texas (CCEP).

On, July 21, 2023, at approximately 7:27 am, I United States Border Patrol Agent/Task Force Officer Javier Lorenzo was contacted by United States Postal Task Force Officer Irving Reynolds. Officer Reynolds requested that I, along with K-9 partner Ekym, badge number 220003, assist in conducting a non-intrusive K-9 sniff of a specific United States Postal parcel. I, along with K-9 Ekym, responded and arrived at, 5640 East Taft Rd Syracuse, NY 13220 at approximately 9:05 am.

At the location, TFO Reynolds requested that the K-9 team conduct a K-9 sniff of suspected package EI 688 956 625 US. I, Agent Lorenzo deployed K-9 Ekym and began the sniff. During the sniff, K-9 Ekym alerted and indicated to the presence of odor of narcotics emanating from parcel EI 688 956 625 US at approximately 9:35 am.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: July 21, 2023



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Javier Lorenzo  
United States Border Patrol Agent/  
Homeland Security Investigations Task Force Officer/K-9 Handler

**ATTACHMENT A**

United States Postal Service Priority Mail Express parcel EI US 688956625, Priority Mail Express Flat Rate envelope, bearing the return address “Joe Allwood 404 Auburn Heights, Auburn, New York 13021” and addressed to “The Claro Consulting, 3234 E. Yosemite, Ontario, CA 91762.” The parcel measures approximately 15” x 12”x 3.”



## **ATTACHMENT B**

### **Items to Be Seized**

Evidence of violations of Title 21, United States Code, §§ 841(a)(1) and 846, and 18

U.S.C. § 1956:

1. Any controlled substance under federal law;
2. Paraphernalia used and commonly associated with the possession and distribution of controlled substances, including, but not limited to: packaging materials, plastic baggies, plastic or glass vials, pipes, and any materials used for “cutting” or diluting controlled substances, such as Inositol, Boric Acid or MSM;
3. Cash, precious metals, money orders, bank checks, stones, jewelry, and other assets derived from the sale of controlled substances;
4. Drug or money ledgers, drug distribution or customer lists, drug supplier lists, correspondence notations, logs, receipts, bank receipts, wire transfers receipts, documents containing bank account information, journals, books, records, or any other documents noting the price, quantity and/or times when drugs were obtained, transferred, sold, distributed and/or concealed;
5. Financial instruments purchased with currency derived from the sale of controlled substances, including travelers checks, bonds, stock certificates, cashier’s checks, money orders, certificates of deposit; and
6. Records, items, and documents reflecting travel in furtherance of drug trafficking, including credit card receipts, U.S. Postal Service receipts, mailing labels, packaging (including mailing cartons, mailing labels, and wrapping materials such as plastic wrap, vacuum sealed bags,

carbon paper, and other such materials), airline tickets, hotel and restaurant receipts, canceled checks, maps, and written directions to locations.